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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

FACEBOOK, INC. and MARK ZUCKERBERG,

Plaintiffs,

v.

CONNECTU LLC, (now known as CONNECTU
INC.) CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, DIVYA NARENDRA,
PACIFIC NORTHWEST SOFTWARE, INC.,
WINSTON WILLIAMS, WAYNE CHANG, and
DAVID GUCWA, AND DOES 1-25,

Defendants.

CASE NO. C 07-01389 RS

**SUPPLEMENTAL DECLARATION OF
JOHN TAVES IN SUPPORT OF
DEFENDANTS PACIFIC
NORTHWEST SOFTWARE, INC.'S
AND WINSTON WILLIAMS'S REPLY
TO PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS
FOR LACK OF PERSONAL
JURISDICTION**

Date: July 11, 2007
Time: 9:30 a.m.
Dept. 4
Judge: Hon. Richard Seeborg

1 I, John Taves, declare,

2 1. I am a principal in the Washington State entity known as Pacific Northwest Software,

3 Inc. ("PNS") If called as a witness in this matter I could and would testify competently as follows:

4 2. I submitted a declaration on or about March 21, 2007 in this matter.

5 3. PNS is informed that Facebook, Inc. alleges that its principal place of business is in
6 California. PNS has never been told of this contention, and did not learn of it until it was served with
7 the First Amended Complaint. Until served with the First Amended Complaint, PNS had no
8 knowledge of where Facebook Inc. was organized, or where its principal place of business was
9 located. PNS has never met Plaintiff Mark Zukcerberg and has never been told nor has never learned
10 where Mr. Zuckerberg lives or resides.

11 4. From the time PNS was organized in 1998 until the present, PNS has been a small
12 entity with 2 principals, each of whom reside in Washington state. PNS has always been in the
13 business of writing software. At no time has PNS concentrated its efforts on serving entities in
14 California. By far, since we have been organized, the vast amount of the entities for whom we have
15 provided services are located in the Northwestern part of the United States.

16 5. Although we have from time to time served entities whom we have learned had a
17 presence in California, such activities are more sporadic and attenuated. I estimate that PNS has
18 generated approximately \$8 million in revenues. Since our inception, we have five, what I would
19 identify as major clients. I am not aware that any of these major clients is located in California.
20 Regarding the work that PNS has done for its major clients, the individuals with whom PNS has dealt
21 were not located in California.

22 6. In response to the First Set of Interrogatories Propounded to PNS, I identified 10 PNS
23 clients for whom our records disclose a California contact. None of these entities identified in these
24 responses has provided what I would consider a significant portion of revenues to PNS.

1 7. From time to time, PNS would retain independent contractors to perform limited
2 software writing services. I have identified these individuals in response to the First Set of
3 Interrogatories Propounded to PNS. Many of these California-based contractors have been what I
4 would term journey men contractors. Other than one or two, they have only provided services for
5 PNS for a short time before pursuing other ventures.

6 I declare under the laws of the United States that the foregoing is true and correct and that this
7 declaration was executed on the fifth day of July 2006 at Seattle, Washington.

John Taves